

## Complex Disputes

April 7, 2022

Honorable Alvin K. Hellerstein  
United States District Court,  
Southern District of New York  
40 Foley Square,  
New York, NY 10007

**Re: *GBM Global Holding Company Limited v. The Unidentified Individuals Listed on Schedule A.* 1:21-cv-06284-AKH – Status Update**

Dear Judge Hellerstein:

Pursuant to Judge Nathan's earlier order dated March 22, 2022, Dkt. No. 26, the undersigned writes to provide a status update.

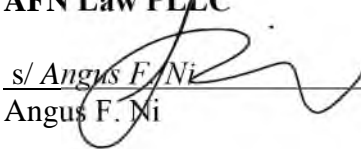
The arbitration commenced by Petitioner against the same Defendants in this action, which the preliminary injunction of August 23, 2021 was issued to aid, is ongoing. Defendants were served but have not appeared in the arbitration.

Pursuant to a briefing schedule set by the arbitrator on January 31, 2022, Petitioner filed a merits submission on March 16, 2022. Defendants were to respond by April 1, 2022 but have not done so. Petitioner's reply deadline had originally been set for April 15, 2022. Petitioner intends to update the arbitrator shortly regarding Defendants' non-response, so that the arbitrator may give directions as to next steps in the arbitration.

Given Defendants' default, an award is expected soon. Petitioner respectfully asks that pending the final arbitration award and its enforcement, the Court should not dismiss this case.

Sincerely,

**AFN Law PLLC**

  
s/ Angus F. Ni  
Angus F. Ni

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